

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE:	§	
	§	
WBH ENERGY, LP,	§	Case No. 15-10003
WBH ENERGY PARTNERS LLC, and	§	
WBH ENERGY GP, LLC,	§	Chapter 11
	§	
Debtors.	§	<i>Jointly Administered</i>
	§	

**UNITED STATES ENERGY DEVELOPMENT CORPORATION'S MOTION FOR  
TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING PURPOSES**

**A MOTION TO EXPEDITE HAS BEEN FILED**

TO THE HONORABLE H. CHRISTOPHER MOTT  
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW U.S. Energy Development Corporation (“**USED**”) and files this Motion for Temporary Allowance of Claims for Voting Purposes (the “**Motion**”), as follows:

1. USED has filed a Proof of Claim in each of these jointly administered cases in the amount of at least \$11,400,000 (each a “**POC**,” and collectively the “**POCs**”). *See* Case No. 15-10003, Claim No. 69; Case No. 15-10004, Claim No. 32; Case No. 15-10005, Claim No. 14. The POCs were all filed on May 11, 2015.

2. The Debtors filed an objection [Doc. 453] (the “**Objection**”) to the POCs on July 22, 2015—only two days after USED objected to the Debtors’ disclosure statement, and only one day before the hearing on the disclosure statement had been set.

3. The First Amended Joint Plan of Liquidation [Doc. 459] (the “**Plan**”) filed by the Debtors is set for hearing on confirmation on August 20, 2015. Ballots and objections are due on August 14, 2015.

4. With their belatedly filed Objection, the Debtors are seeking to prevent USED from voting. The Joint Disclosure Statement for the Debtors' Proposed First Amended Joint Plan of Reorganization [Doc. 458] (the "**Disclosure Statement**") explicitly states that it *assumes* the USED's claims will be denied. *See* Disclosure Statement, p. 14 n. 2.

5. USED requests temporary allowance of its claim for voting purposes under Rule 3018 of the Bankruptcy Rules, so that it is allowed to vote in this case.

6. Because the Objection is intertwined with certain pending adversary proceedings and other legal issues, there may not be a determination prior to confirmation. Accordingly, temporary allowance for voting purposes is appropriate.

WHEREFORE, based on the foregoing, USED requests that the Court temporary allow its claims for voting purposes and that it have such other and further relief to which it may show itself justly entitled. A copy of the proposed Order is attached hereto.

Respectfully submitted,

TAUBE SUMMERS HARRISON TAYLOR  
MEINZER BROWN LLP

By: /s/ Christopher G. Bradley

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ATTORNEYS FOR U.S. ENERGY  
DEVELOPMENT CORPORATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing has been served upon those parties receiving the Court's ECF e-mail notification on this 7th day of August, 2015.

/s/ Christopher G. Bradley  
Christopher G. Bradley